

January 5, 2015

Dear Court Clerk:

DEFENDANTS

MBTA, Linda Portis Clement

I am requesting your assistance with this urgent matter. This case was filed with the MBTA internally, and I have not received any information on resolution to date. I am requesting your assistance to resolve this concern and provide relief.

Resolution Request:

Due to being wrongly terminated by Linda Portis Clement, Justin Crawford, HR informed me that the offer for the other position that I received an offer for within the MBTA was canceled. He was very apologetic that I encountered this unpleasant situation. I would like this case to be resolved. I would like to be given a fair opportunity to work in the new role of interest offered prior that directly aligns with my background. I am a professional individual, with respect for others, and myself and am not pleased with Linda Portis Clement defaming my character.

To demonstrate my professionalism, during her process of termination, I provided her with a written resignation with my intent to fulfill the terms of employment until the last date. I allowed her to have the stage, as she demands.

She used the sticky note she requested from me to state I returned the badge, and I decided to include that I returned the key, as well. I signed it, and she asked; this is your signature? Ok, ok. She then used it by affixing it on the termination letter, which is falsification.

Also, I am requesting monetary compensation for the extensive delay in resolving this concern, for mental anguish, harassment, discrimination, retaliation hired under false pretense and of duties, and defamation of character.

I look forward to your timely reply.

Thanks,

A handwritten signature in black ink, appearing to be 'E. A.', written over the word 'Thanks,'.

FILED
IN CLERKS OFFICE
2015 JAN 20 PM 12:52
U.S. DISTRICT COURT
DISTRICT OF MASS.

Jan.3, 2013

MBTA
Park Plaza
Boston, MA

RE: Edna Edmonds
Attn: Justin Crawford

Dear MBTA Human Resources Management:

RE: Statement to resolve the false accusation made by Linda Portis Clement in conjunction with Falsification, False Allegations, Harassment, Attack and Defamation leading to health deterioration.

I am filing a statement for resolution against Linda Portis Clement for Falsification, False Allegations, Harassment, and Defamation in workplace and upon separation. The extent and severity of these concerns continuously produced a hostile work environment leading to health deterioration. I am very displeased regarding the situation I experienced for the short time during my internship employment at the MBTA. My goal was and still is to maintain a professional and peaceful demeanor by removing myself from the unpleasant work environment.

I am very displeased regarding the situation I experienced during my time at the MBTA.

This letter of concern is being provided to resolve the inaccurate termination accusation, and to address a number of critical issues, and actions carried out by Linda Portis Clements.

Background Information

An internship is a program that provides a student or graduate with on the job training to gain relevant experience, skills in a particular role of interest to those interested in entering into a targeted field. An internship provides an intern with the opportunity to make professional connections. An internship provides the intern with the opportunity to participate in an internship role and the option to express interest in available opportunities of interest.

For Example: A physician who recently graduated from medical school is expected to learn medical practice skills under the supervision of seasoned physician(s) in an internship program. An attorney or engineer cannot provide a physician intern with the required skillset necessary.

I received a few communications from Linda Portis through the University expressing interest in my professional/educational background. Towards the end of August 2012, I responded to Linda Portis Clements to obtain information regarding the internship opportunity. I asked her to email the job description to me, but said she didn't have the description to email to me, but I can view it online. She provided me with a very professional overview over the phone for required job

duties. She explained what the job specifications were, which was identical to my previous background. Then she said, "That's why I need someone with your background." She specifically discussed succession planning, LMS, PeopleSoft, HR/ technology as the job duties. I was excited and figured this will be a good opportunity while I pursue my educational requirements.

Through additional communication between Ms. Clements and myself, I was informed that this was a professional opportunity to gain HR/Information Systems Technology skillset. Based on the information Linda Portis Clements provided to me about this opportunity during the phone interview confirmed that this was in fact a professional opportunity including duties relating to HR and Information Systems Technology. She stated, "This is what attracted her to my resume and she is very impressed." She told me that I would have the opportunity to work in areas of Succession Planning, Learner's Management Systems (LMS), PeopleSoft, and Training and Development. She assured me that she was about to retire and she would like me to fill her position as the Director of Training and Development. She stated, "this will be a fast transition and I will train you and hire you permanently at the end of December 2012." I expressed that I was interested in this opportunity because of the HR and Information Systems Technology responsibilities involved.

Then, I informed Ms. Clements that I had a short term project engagement at the time and was not able to make it for an in person interview. She said I am very impressed with your resume, professional and educational background, so I will do a phone interview, provide two-three references, and she told me I was hired for the internship position. I told her we can use the three months to determine if this is an opportunity of interest and if it's a good fit for both of us and if not, we can end the agreement at the end of December 2012. She agreed.

However, shortly after the internship began, she told me, "It will be a couple more years before she would retire." She also told me, "do not get into conversation with Justin Crawford. He asked questions to try to mess up the internship when I send the interns to him. If he has any questions tell him to ask me."

As an intern, I quickly realized that this environment was hostile and not productive. Therefore, my focus was to simply remove myself from this environment in a quiet and professional manner.

Falsification

Ms. Clements informed me that this internship was a full-time 40hrs opportunity at \$12.00. I was concerned with the pay but figured as a short term internship, I will give it a chance. When I reviewed the job description after the phone interview everything was as discussed except the hours, which was listed as 20hrs/week and the pay at \$10/hourly. I brought it to her attention and she said, "I will update the hours to 40 hours and pay to \$12. You will get a copy of the salary and hours before you start from HR." She never informed me that she would update the job description. While working as an intern I decided to browse the opportunities and reviewed the job description, I noticed she not only changed the hours and pay, but also updated the job

description to whatever needs to be done and setting up and breaking down venues, etc. Ms. Clements was aware that she contacted me through the graduate program of the university and as I discussed to her during the phone interview, I was looking for an intern opportunity of interest that closely aligns my previous professional and educational background. I was in disbelief when she asked me to set up the room for training, which required lifting chairs, tables, etc. with no assistance. There were a few employees that offer their assistance. I asked the male intern to assist with lifting the tables and I will lift and set up the chairs for trainings. However, I completed as requested by remaining positive. She also discussed that she does the training for the department. She stated that she does the training and mentoring for the entire department, but in actuality, her responsibility is to contact the vendors to schedule the training. She stated, "I will hire you on permanently before your internship ends in Dec. I want you to fill the director position." I later learned that Ms. Clements had no power to do so; and as I explained to her prior to hire and during my internship, I am interested in an opportunity that closely aligns my interest and background. However, I remained positive, completed the task that were provided and kept away from her actions of retaliation by remaining positive and not feeding into her unprofessionalism.

Her actions are a clear indication of her unstable and malicious thought process and the unfortunate situation I had to tolerate for the past two months. An internship program is to provide the intern with an opportunity to obtain skills that can be transferred into future opportunities of interest, and not to be utilized for one's personal gains. As a professional I can state without a doubt that Linda Portis Clements does not possess the professionalism, integrity and knowledge to guide brilliant minds for growth.

After becoming aware of her dishonesty and the type of environment I was misled to becoming involved in, my main focus was to quietly remove myself from this type of environment. It was a hindrance to my professional, educational background and future growth. However, I remained professional at all times. For example: Ms. Clements gave me a task to go through a stack of boxes for a total of three days. I had to stand and remove the staples, paper clips, from the files and place the files back in the same order. I sat for a few minutes and she came over to my desk and asked if I completed the boxes already? I remained positive through completion. Ross C. provided me with the instructions on what needed to be done with the stack of boxes per Linda's request, and she followed him to my cubical and stood there until he finished telling me what to do with the boxes. During your investigation, I am requesting for you to allow Ross C. to provide you with a clear insight of his interaction with me during and upon completion.

Job duties (Menial)

(End of Nov.) Make copies, take this to one of the employees, type, binder/binding, hole punching, print, come to my office and get a document from the file cabinet for me, filing, move/lift chairs and tables, organize chairs and tables, set back chairs and table. (Oct.) Give me some ideas for the mini round table. She then stated the ideas were good, but one of the ideas she

did not like. Then she turned around and discussed it as her idea(s). Go and open the front door for the school intern, throw the pile of papers in the bin outside. (Sept. - Nov.) Pretend like you are working when anyone passes by because I am trying to get both of my interns to be hired as my assistants, so you will do everything that I am now doing so I don't have to do any of this.

Lack of Professionalism

Ms. Clements informed me that I can leave the job whenever I needed to but be discrete. I told her I would like to work full-time and I will fit all of my appointments, advising sessions/classes around my work schedule, which I did. I used my lunch time to attend the few appointments I had and I would informed her that I may need an additional 15-30 minutes. I also expressed interest in making up the hours missed. Her approach was not only unprofessional but disrespectful. She had a very odd controlling behavior towards me.

She would say to me, "Type this and do it now, come in my office, sit down, go back to your desk and do this now, put your note book back down and go and type this right now." She talks on the phone all day (personal calls.) If I go to the rest room, where were you? She told me don't talk to anyone except the few people she pointed out, which were Sonia, Horace, Cheryl, Ken Boveric... The others will talk to you just to ask questions about your education, experience to find out what they want to know and that's it. No one will come to talk to you when I'm here. She would instruct Kyle that when she's not there he must call me and say come for a minute to prevent anyone from talking to me.

She would randomly state you see I tried to help you, referring back to her hiring me with only a phone interview. She was very controlling, territorial, odd, unprofessional, etc. She was constantly in my personal space by touching, requesting that I must communicate personal things with her, come to my office before you leave and say good bye to me. You will get very far if you do these things that I say. If not, you will do the things no one wants to do. She expressed interest by verbally inviting herself to my apartment many times. She then started saying, "You probably saying you don't want me to come to your apartment?!" When I was out for about a day or two, she called me in her office when I returned and stated, "This is a gift from me to you and don't tell anyone, put your hours in." On the last day she reminded me of that and said I did that for you to see. "You played games with me." She interfered with my personal phone, asked for my email address to show me how to use a feature on my phone. I explained to her I didn't know the password, I rarely use the email, and I can access it. She asked to sit at my desk, she searched my personal email on my phone for my password, and luckily it was encrypted. She comes in around 10-11am, leave and comes back. She waits until 4:55-5pm and calls my phone or tells Kyle to call me in her office. This was very uncomfortable since the office is usually empty at that time. I explained to her that I don't mind staying over if there is something that needs to be completed that goes over, but due to the lack of work, that was never necessary. She then finds something to do like type, review documents, etc. which resulted in working overtime without pay. This was not necessary after sitting at my desk all day with nothing to do most of

the time. She told me during the interview process that she doesn't like to use email because it's records, so she uses the phone. When I communicated with her by email during my internship she gets upset and says, "come to my office to speak to me and don't send me any emails." She asked me to drive and for her to ride with me to park plaza and Cabot about three times and send message with Kyle one time that I must drive and for him to ride with me instead of us taking the public transportation. I was informed that she always makes the interns drive when going off site.

Agenda

Towards the end of November she was out and she called Kyle and asked him to inform me to send the typed document to him for review. I did, he made a copy and brought it to me with the corrections to line up the second line with the first. Upon review I informed him there were no adjustments to be made. I sent it to him to review and I told him let me know how to proceed. I reviewed and about 30 minutes to an hour later he stood up waiting for the employees that were next to his cubicle to leave in order for him to leave early as Linda instructed him to. The following week she approached me aggressively asking did you complete and send the memo. I said you never gave it back to me requesting for it to be sent. She went to Kyle did you review it? He said, "yes, I did." Everything was fine but she went to lunch, so I did not get a chance to get back to her. My lunch that day was about 15 minutes to get something and when I returned he was gone.

Ms. Clements would instruct me that I must say, "goodnight everybody" when I am leaving and not say goodnight to everyone individually. She instructed me of that on a number of occasions. This was definitely inappropriate and not within the lines of developing professional skill for future employment. She stated, Sonia says it like that and that's how you must say it.

When one of the employees requested for me to go to the project site with him to see the Charlie Card App project, she said, "no, Edna have too much to do." I was sitting at my desk with nothing to do. I had nothing to do for approximately two months, which led me to express to her that I came in happy but is steadily losing my motivation. I express interest in entering the information in PeopleSoft, which I have asked her about for some time now, but she kept on stating, "That's not a priority." I told her I am willing to work on it since I have nothing to do all day. I even told her that I can work on it around anything that may need to be done.

She would tell me she doesn't have anything to do, so Kyle and I must pretend like we are working in order for it to look like we are always busy. This will allow her to request for us to come on permanently in the assistant roles to get benefits. She stated her intentions were to not have to do any of the work she is currently doing, and for her to have both of us as her assistants to do it. She told me, **"the only way for you to get in with the MBTA is through me. You will not be able to get in with any of the other managers in the positions you may see as vacant."** She would state that anyone that has a degree in nutritionist or any other degrees besides

Engineering or related degrees will not be able to get in any of the vacant positions with the MBTA. Later on in conversation with the male intern I became aware that he has a degree in nutritionist and entrepreneur. He also stated he is trying to apply this as his working experience and wants to get in with the MBTA to get benefits. He also stated he looked into the tuition reimbursement program through the MBTA. As a manager for undergraduate and graduates Linda continues to demonstrate inappropriate and unprofessional behaviors and communication.

She stated," she is the one that hires the interns for the employees at the Arborway, and made a comment to me that she is not giving one of the project managers any interns. She always walks around like she has so much work to do and she is too cocky."

There are instances where I would say good morning to Linda and she would not answer and aggressively request for me to do something. Around the end of November beginning of December she asked me to work on the boxes while both her and Kyle went to the Microsoft training at the Arborway. When I pass by I happened to looked in the class, she quickly got up and left the session.

She would state that I am the facilitator of the training if they need anything, Kyle would say the same thing she states. After the training in December she called me in her office to ask why did you attended the training? When I start to reply she started yelling, "I don't want to hear it" "You did not complete the updates Kyle gave you." I completed the updates exactly as instructed, so I re-submitted it to her via email. She then called Kyle and said, Hi Kyle can you see if Edna did the updates. He came to my desk and I went over the updates he gave me, and he said underline the numbers as I actually had previously. Can you give me back the print out I gave you with the update instructions, he stated, which did not indicate as they both stated. She whispers to him about others instead of carrying herself in a professional manner.

She told Kyle to give me the documents to type in order to create the manual and this is a priority. While I was typing she came to me and said," stop this, and do what I am giving you to review and make notes of any errors." I sent what I completed typing to Kyle as instructed, I made a copy of the last page I had remaining to type, I brought the document upon review to her, and I went to the rest room. When I returned the documents that I was typing was removed from my desk.

Inappropriate Gestures/Harassment

She provided me with a gift by allowing me to put in hours I requested and took off in October by stating, "This is a gift from me to you, don't tell anyone." On the very last day she brought this up by stating, "I tried for you to see by telling you to put your hours in to get paid for the days out, but..."

She stated on many occasions about coming over to my apartment when I moved.

She has picked up my personal phone and preceded to resetting the password for the email account even after being told I don't use it, I can review my emails without resetting password. She even scroll through my personal email, selected the email that stated password. Luckily the password was encrypted.

On many occasions she invaded my space by touching while talking, at one time while talking to me she said, "turn around to face me," huh?, immediately reached for my charm and placed it on the mid area of my front/chest.

She would tell me, "I really like you, Edna" "Do you want to work here with me or not?" "I'm on your side" "I want someone that wants to stay in this position and not someone that wants to be elsewhere." In November she told me, "I never hire someone for one term only. The previous person was here with me for three terms. I want you to stay on after Dec. Would you like to?" I was honest and professional and I expressed to her that I am willing to perform the duties of the role as long as I am in that role regardless of what it is. I expressed to her my concern was the direct work environment. Therefore, I would like some more time to see if this is an opportunity I can consider after Dec. I pointed out some instances of her tone of control. However, I said, "I would like to request the opportunity to inform you of my decision." She stated, "ok." My awareness was confirmed that she would not be pleased if I expressed interest in any other opportunity besides continuing with her after Dec. It was clear to me that she would have retaliated maliciously.

She made the statement, "you see I tried to help you" on many occasions with no connection. On the last day she stated again, I tried to help you by hiring you without an in person interview."

If she sees me communicating with the employees she would get very angry, later on she would call me to her office and asked do you want to be here? I explained to her I will continue to perform all tasks that are requested of me while I am here. I also stated that regardless of the type of opportunity (good or bad), there is always something that can be learned.

When I decided to arrive to work early, about an hour or two in advance, she was very angry. She walked around angry without saying speaking to me, drove her vehicle for those days and took Kyle to the offsite location with her. She started coming in early along with Kyle and stated; "you are to communicate to me when you are coming in early." I explained to her that I am not sure how early I will arrive every day, but I am doing so to be here well in advance prior to my requested start time, and I do not leave early.

Towards the end of November I requested a half a day off (Thursday, Dec. 6th) for a last minute appointment. For the previous two instances when I requested two days off I told her I was requesting it way in advance. I took that precaution even after she told me I can leave if I need to by being discrete. Linda waited until it was 4:55pm to call me into her office. She said, "luckily it worked out that I have a death in the family, I will be out on Thursday and Friday, and Kyle will leave early on Friday, so take the next two days off without pay (Thursday, Dec. 6th and

Friday, Dec. 7th) and leave your password with me.” I said,” my password?” She said,” yes, to get the file from your computer.” The file was given to her in a folder as instructed the previous time, and the same was done this time. This action was malicious and vindictive to the highest level. She called me a number of times Wednesday, text and call all day Thursday in reference to my work/computer password. I replied twice stating,” I will figure this out when I returned to work on Monday.” She continued making phone calls to my personal phone number, which she told me after week 2 that she memorized my number. Around 6pm on that Thursday she called ITD under my name, provided them with my employee id number to reset my password. This action is totally wrong and violates HR policies and procedures.

On more than one occasion, I’ve been away from my desk to make copies, whole punching for manuals she requested, or using the restroom; Ms. Clements would go to my desk and pick up my personal bag that’s kept in the corner to protect it, according to her. This was not necessary. The inappropriate gestures were never done towards the male interns that left their bags on the floor and other visible areas in the cubical.

She was not in favor of me interacting or gaining sufficient skillset from any of the other managers/employees. She would tell me, “I need someone that wants to be a training and development assistant. If not, I won’t need you.” I never hire anyone for one term. Do you want to be here? I really like you. I’m on your side. I informed her in October that my concern is the direct work environment. I will need a little more time to determine if I would stay on after December, and I would like her to allow me the opportunity to discuss that with her. She said ok.

On the Monday, Dec. 10th, (following the two days she requested for me to take off without pay), I came in with my resignation letter to professionally inform her that I am not interested in continuing the internship with her after December. She called me into her office, I walked in with the resignation letter in my hand, she then went to the file cabinet, pulled out the intern folder and asked Kyle to type the termination letter. She insisted, as usual, that I shouldn’t respond to anything she says. I said,” ok,” as my reply, and then I said,” I would like to give you this (resignation letter) and thank you for the opportunity.” She said, “it is a termination.” She said,” you see I tried to help you by hiring you without an in person interview, I let you put your hours in so you can see, you played games with me. I’m terminating you.” I said. “Okay. Thanks for the opportunity.” She said,” I will make sure I put it in your file.” I said, that’s fine, but I walked in with this letter to confirm as discussed prior my intentions not to continue after December.” Ms. Clements said,” turn in your access card and exit the building.” She was angry and verbally attacking, as usual. She said,” a degree doesn’t mean anything.” She followed me to my desk, I gave her the access card and the key, and Kyle gave her the termination letter, which stated,” she was terminating me for performance and below stated I returned my access card.

She said,” give me your password.” I said,” I can log in for you while I am here. I told her giving her my password is a breach of the security policy.” She said,” I will contact IT.” She asked me,

“to sign;” I professionally informed her that I will not be able to sign since the information is not accurate. She said,” initial below to state you turned in my access card in order to get your check direct deposited.” I once again informed her that I cannot initial since the information above is not accurate. She asked me,” to write on a sticky that I turned in my access card, and sign,” which I did. She told me,” to exit the building,” (I thank her again for the opportunity) which I did with her following directly behind me. When I got to the door she turned around. She went inside one of the offices to peep at me through the window, but since I stood on the side of the building she didn’t see me, so she came back to the door and stood in the corner peeping out at me.

She stated that I was shy and therefore, others will take advantage of me. Now she is making false allegations to justify the reasons for her actions.

Defamation

The false allegations Linda Portis Clements has made in the workplace and submitted to HR is a clear expression of the harassment, inappropriate and uncomfortable actions that affected my health during my time of employment. I have medical documentation to support my health concerns as a result of the work environment endured while working with Linda Portis. It interfered with my ability of proficiency. In order to eliminate the critical situation encountered, I professionally seek other opportunities within the MBTA that appropriately aligns my further career goals. The managers and employees in the department of interest demonstrates a professional demeanor and the interest in supporting my goals and interest based on the requirements for an internship program and not for their own gains for advancement or to relieve them from their responsibilities. This is a concern of defamation that I am requesting HR to provide their professional assistance to reach a resolution.

Witnesses

I can provide a number of witnesses both openly and confidentially to provide you with an accurate insight on my professional interaction, demeanor, and positive outlook in a hostile work environment.

Closing Statements

I am requesting your assistance to resolve the false allegation made by Linda Portis Clements. This is a clear indication of her retaliating based on her personal feelings of rejection. Her unprofessional intentions that I owe her for trying to help me by hiring me since I was able to complete a phone interview, and not an in person interview is inappropriate. This was a very uncomfortable setting. Taking a look at her false allegations through professional lenses, it is obvious that Linda Portis Clement is in direct violation of employment laws including breach of security. In closing, I am not comfortable with Linda having access to my personal information, files, etc. Therefore, I am requesting that this case be properly investigated and appropriate actions be taken to resolve this complaint.